

The Honorable Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PHILADELPHIA INDEMNITY
INSURANCE COMPANY, a Pennsylvania
corporation, as subrogee of DH&G, LLC.,

Plaintiffs,

v.

HEWLETT-PACKARD COMPANY,

Defendants.

No. 2:19-cv-00138-TL

DECLARATION OF CHRISTOPHER G.
BETKE IN SUPPORT OF DEFENDANT'S
MOTION TO EXCLUDE THE
TESTIMONY AND OPINIONS OF
MICHAEL ESKRA

I, Christopher G. Betke, depose and state follows:

1. I am counsel for HP, Inc., named in this action as Hewlett-Packard Company.
2. The statements contained herein are based on my personal knowledge.
3. Attached hereto as **Exhibit 1** is a true and accurate copy of the July 10, 2021 report of Michael Eskra.
4. Attached hereto as **Exhibit 2** is a true and accurate copy of portions of the February 14, 2023 deposition of Michael Eskra.
5. Attached hereto as **Exhibit 3** is a true and accurate copy of the affidavit of Quinn C. Horn, Ph.D.

Signed under penalties of perjury in Boston, Massachusetts this 30th day of May, 2023.

/s/ Christopher G. Betke
Christopher G. Betke